

United States Senate

WASHINGTON, DC 20510

September 25, 2019

Brandon L. Van Grack
Director, FARA Registration Unit
National Security Division
U.S. Department of Justice
175 N Street, NE, Constitution Square
Washington, DC 20002

Dear Mr. Van Grack:

We write to renew our request that the Department of Justice review whether President Trump's personal attorney, Rudolph Giuliani, is in compliance with the Foreign Agents Registration Act (FARA).

In a September 6, 2018 letter, we requested that – given Mr. Giuliani's political and public relations activities on behalf of foreign governments and interests – the Department review whether he had an obligation to register any undisclosed political activities, had any delinquent filings, or had any deficiencies or abnormalities in his registration statements.

Since this request, we have received no formal response from the Department. In the meantime Mr. Giuliani has continued to engage in activities on behalf of foreign governments and interests while at the same time continuing to communicate with senior U.S. government officials and foreign leaders in his capacity as the President's personal attorney. For example, public reports have established that:

1. Mr. Giuliani headlined a pro-Russian conference in Armenia in October 2018 at the invitation of a wealthy Russian Armenian, Ara Abramyan, where he shared billing at the event with Sergey Glazyev, an advisor to President Putin who has been sanctioned for his role in the illegal Russian occupation of Crimea.¹
2. He met with the King of Bahrain in December of 2018 to discuss "topics of joint interests" and subsequently signed a security consulting contract. The state media of Bahrain called Mr. Giuliani's visit a "high-level U.S. delegation."²

¹Josh Kovensky, *Trump Lawyer Rudy Giuliani Headlines Pro-Russian Conference in Armenia*, WASH. POST, Oct. 23, 2018, <https://talkingpointsmemo.com/news/trump-lawyer-rudy-giuliani-headlines-pro-russian-conference-in-armenia>.

²*HM King receives high-level US delegation*, BAHRAIN NEWS AGENCY, DEC. 11, 2018, <https://www.bna.bh/en/HMKingreceiveshighlevelUSdelegation.aspx?cms=q8FmFJgiscL2fwIzON1%2BDkyYwVQQpyJl1CgCuP9r3iw%3D>.

3. He traveled to Albania in July 2019 to speak to the Mujahedin-e Khalq (MEK), a group formerly designated as a terrorist group by the U.S. government, where he spoke about the potential for regime change in Iran.³
4. At another MEK sponsored appearance in Warsaw in February 2019, he reportedly “reveled in condemning Iran even as he insisted he was in no way speaking for the Trump administration. He said the MEK had been his client for 12 years, and that he had often spoken on its behalf, often for a fee.” He was also quoted, saying “[w]e want to see a regime change in Iran.”⁴

These are just a handful of new and continued activities by Mr. Giuliani which appear to be paid by foreign entities and government with a desire to influence U.S. policy.

Notably, recent reports regarding Mr. Giuliani’s efforts to pressure the government of Ukraine to investigate former Vice President Joe Biden’s son to benefit the President’s reelection also raise serious additional questions about the legality of his work as a foreign agent while also representing and working on behalf the President regarding official U.S. policy.⁵

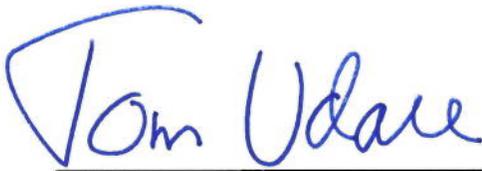
Like any other American, Mr. Giuliani has legal obligations to report his work on behalf of foreign clients, and the Department of Justice should not give him preferential treatment or exempt him from his obligation just because he is the President’s personal attorney. Accordingly, his work as a foreign agent requires thorough review by your office to ensure his compliance with the FARA requirements.

³Rudy Giuliani Calls for Iran Regime Change at Rally Linked to Extreme Group, THE GUARDIAN, Jun. 30, 2018, <https://www.theguardian.com/us-news/2018/jun/30/rudy-giuliani-mek-iran-paris-rally>.

⁴David E. Sanger and Marc Santora, Anti-Iran Message Seeps Into Trump Forum Billed as Focusing on Mideast Security, NY TIMES, Feb. 13, 2019, <https://www.nytimes.com/2019/02/13/world/middleeast/warsaw-summit-pompeo.html>.

⁵Greg Miller et al., *Giuliani Pursued Shadow Ukraine Agenda as Key Foreign Policy Officials Were Sidelined*, WASH. POST, Sep. 24, 2019, https://www.washingtonpost.com/national-security/giuliani-pursued-shadow-ukraine-agenda-as-key-foreign-policy-officials-were-sidelined/2019/09/24/ee18aaec-deec-11e9-be96-6adb81821e90_story.html.

Sincerely,



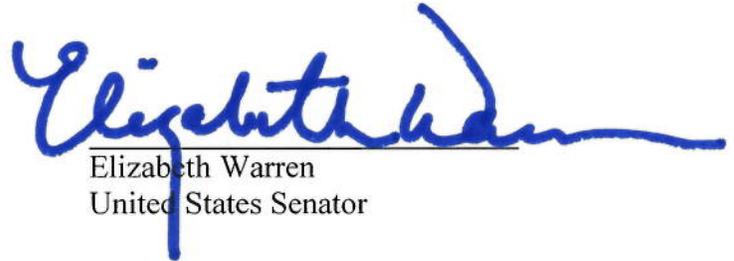
Tom Udall
United States Senator



Richard Blumenthal
United States Senator



Sheldon Whitehouse
United States Senator



Elizabeth Warren
United States Senator



Tammy Duckworth
United States Senator



Richard J. Durbin
United States Senator



Jeffrey A. Merkley
United States Senator

Enclosure

cc: The Honorable John C. Demers
Assistant Attorney General